UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

No. 24-CR-556 (DEH)

- against -

ERIC ADAMS,

----,

Defendant.

DEFENDANT ERIC ADAMS'S NOTICE OF MOTION FOR LEAVE TO FILE A BILL OF PARTICULARS

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Criminal Procedure 7(f), Defendant Eric Adams, by and through undersigned counsel, respectfully seeks the Court's leave to move for a bill of particulars. *See* Fed. R. Crim. P. 7(f) ("The defendant may move for a bill of particulars before or within 14 days after arraignment or at a later time if the court permits."). Mayor Adams's request relates in part to Count V of the indictment, which this Court declined to dismiss in its order of December 17, 2024. ECF No. 68. In addition, the volume of discovery produced in recent weeks has amplified the need for a bill of particulars.

PLEASE TAKE FURTHER NOTICE that, if the Court grants Mayor Adams leave to move for a bill of particulars, then upon the accompanying memorandum of law, Mayor Adams, by and through undersigned counsel, will move this Court on a date and time to be designated by the Court, before the Honorable Dale E. Ho, at the Thurgood Marshall United States Courthouse, 40 Foley Square New York, NY 10007, for an order directing the government to produce a bill of particulars pursuant to Federal Rule of Criminal Procedure 7(f), as set forth in the memorandum of law. In the alternative, to the extent that the Court denies the motion for a bill of particulars, Mayor Adams will move for an order directing the government to disclose its trial exhibits sixty (60) days before trial pursuant to Federal Rule of Criminal Procedure 16.1(b).

PLEASE TAKE FURTHER NOTICE that pursuant to Local Criminal Rule 16.1, the undersigned counsel has met and conferred with the Government and attempted to resolve the issues raised by the bill of particulars motion in good faith without the Court's intervention, as described in the accompanying declaration of John F. Bash submitted herewith.

Dated: December 18, 2024 Respectfully submitted,

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